

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
No. 7:23-cv-00897**

IN RE:)	
CAMP LEJEUNE WATER LITIGATION)	DEFENDANT UNITED STATES
)	OF AMERICA’S MOTION FOR
This Document Relates To:)	PARTIAL SUMMARY JUDGMENT
<i>All Cases</i>)	CONCERNING DICHLOROETHYLENE
)	(Fed. R. Civ. P. 56; L. Civ. R. 56.1)

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Civil Rule 56.1, the United States moves for partial summary judgment on all claims alleging that dichloroethylene (“DCE”) caused any of the Track 1 diseases.¹

In support, the United States relies on the arguments and authorities in the accompanying Memorandum of Law in Support of Motion for Partial Summary Judgment, the Local Civil Rule 56.1 Statement of Material Facts, the Joint Appendix (*see* D.E. 456), and the Appendix to the Local Civil Rule 56.1 Statement of Material Facts. As set out in the accompanying Memorandum of Law, Plaintiffs have failed to offer any expert opinion testimony in support of their claims that DCE can cause any of the Track 1 diseases. Because there is a lack of evidence supporting general causation as between DCE and the Track 1 diseases, all such claims necessarily fail as a matter of law. Thus, the Court should grant this Motion and enter partial summary judgment in the United States’ favor on all claims alleging that DCE caused any of the Track 1 diseases.

¹ The Track 1 diseases are kidney cancer, bladder cancer, leukemia, non-Hodgkin’s lymphoma, and Parkinson’s disease. (*See* D.E. 23(XI)(A)(i).)

Dated: September 9, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2025, I electronically filed the foregoing using the Court's Electronic Case Filing system, which will send notice to all counsel of record.

/s/ David R. Ortiz
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